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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Mag. No. 15-6203  
 :  
v. : Hon. Steven C. Mannion  
 :  
DONALD HARING : **CRIMINAL COMPLAINT**  
a/k/a "T.\_Young@ARES" :  
a/k/a "trainumyoung@yahoo.com" :  
a/k/a "PEACHPICKER" :

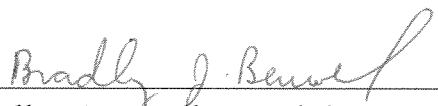
I, Special Agent Bradley Benwell, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

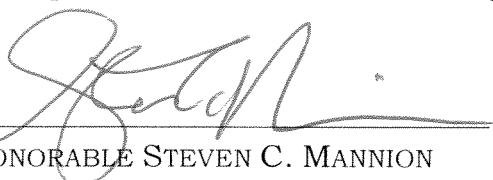
I further state that I am a Special Agent with the Department of Homeland Security, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof.

  
\_\_\_\_\_  
Bradley Benwell, Special Agent  
Department of Homeland Security

Sworn to before me and subscribed in my presence,  
on Sept. 15, 2015 at Essex County, New Jersey

  
\_\_\_\_\_  
HONORABLE STEVEN C. MANNION  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

Count 1

On or about October 19, 2014, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

DONALD HARING  
a/k/a "T.\_Young@ARES"  
a/k/a "trainumyoung@yahoo.com"  
a/k/a "PEACHPICKER"

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and using any means and facility of interstate and foreign commerce, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A), 2252A(b)(1), and 2.

Count 2

On or about June 18, 2014, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

DONALD HARING  
a/k/a "T.\_Young@ARES"  
a/k/a "trainumyoung@yahoo.com"  
a/k/a "PEACHPICKER"

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and using any means and facility of interstate and foreign commerce, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A), 2252A(b)(1), and 2.

Count 3

On or about December 10, 2014, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

DONALD HARING  
a/k/a "T.\_Young@ARES"  
a/k/a "trainumyoung@yahoo.com"  
a/k/a "PEACHPICKER"

did knowingly possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which images had been mailed, shipped, and transported using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that were produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B), 2252A(b)(2), and 2.

## **ATTACHMENT B**

I, Special Agent Bradley J. Benwell, a Special Agent with the Department of Homeland Security ("DHS"), Immigration & Customs Enforcement, Newark Cyber Crimes Group, have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

### **Background**

1. At all times relevant to this Complaint, defendant DONALD HARING ("HARING") resided at 532 Second Avenue, Long Branch, New Jersey 07740 (the "Residence").

### **The Online Forum**

2. In or around July 2014, undercover DHS agents (the "UCs") established an online forum to identify individuals who attempt to distribute, receive, or possess child pornography (the "Online Forum"). The Online Forum was maintained in a controlled environment in a manner that appeared to the prospective user that it was an exclusive and secure members-only website.

3. The "terms of admission" for the Online Forum required prospective members to, among other things, upload images of child pornography after selecting a user name and password.

4. In or around October 2014, a UC sent an email to a user on the known online child pornography forum PEDO HEAVEN BBS. The user had accessed PEDO HEAVEN BBS using an Internet Protocol address that was subscribed to by HARING and was used by HARING at the Residence (the "HARING IP Address"). The email from the UC invited the user to apply for membership to the Online Forum.

5. The user of the HARING IP Address selected the username "PEACHPICKER" and the password "8tasty1" for the Online Forum.

6. On or about October 19, 2014, the user of the HARING IP Address accessed the Online Forum and uploaded approximately 8 images of child pornography to satisfy the criteria for admission to the Online Forum. Three of the files uploaded by the user of the HARING IP Address are described below:

<b>File Name</b>	<b>Description</b>
[blank]	This image depicts a prepubescent female posed in a sexually explicit manner. She is naked except for white socks on each foot that come up above her knees. She is sitting on top of a television. There is a clock on top of the television that reads "3:29". The female's legs are spread exposing her vagina.
[blank]	This image depicts a prepubescent female posing in a sexually explicit manner. She is wearing a blue shirt with colored writing. Her pants are pulled down and her underwear is visible around her mid-thigh. Her vagina is exposed. She is making a "peace sign" with her right hand.
5yrold~1.jpg	This image depicts a prepubescent female posing in a sexually explicit manner. She is naked. She is lying on a multi-colored surface and her arms are propping her upper body off the ground. Both of her legs are bent at the knee. Her right knee is pointed up, and her left knee is touching the ground pointing to the side exposing her genital area.

### **The P2P Network Downloads**

7. On or about June 18, 19, and 20, 2014, a UC accessed a publicly available peer-to-peer ("P2P") network over the Internet and observed an individual, later determined to be HARING, who was using the name "T.\_Young@ARES.com" and accessing the P2P network via the HARING IP Address. According to the P2P network, HARING was sharing approximately 133 files.

8. The UC examined HARING's shared folders and observed files depicting images of child pornography. Between on or about June 18, 2014 at approximately 10:23 a.m. and on or about June 20, 2014 at approximately 8:06 a.m., the UC downloaded from HARING's folders approximately 3 files, each of which depicted child pornography. The three files downloaded by the UC from HARING are described below:

<b>File Name</b>	<b>Description</b>
8anos e 10 anos levando rola na bucetinhas.avi	This video is approximately 1 minute and 1 second in length and depicts a prepubescent female engaged in various sex acts with an adult male. The video begins with the female wearing sun glasses standing in a shower and quickly switches to the female lying on a bed with a towel covering her. When the towel is removed the female is naked. An adult male proceeds to rub his erect penis against the female's vagina. At approximately 30 seconds into the video, the female is shown sitting on the adult male while the two are engaged in sexual intercourse. At approximately 49 seconds into the video the male is shown rubbing his penis against the vagina of the prepubescent female. The female masturbates the adult male for the remainder of the video.
(pthc) valya 10yr (lolifuck) (mst) katrina pussy cumshot wmv.wmv	This video is approximately 16 seconds in length and depicts a naked adult male masturbating while lying next to a naked prepubescent female. The camera is focused on the genital areas of both participants. The male masturbates and rubs the genital area of the female until he ejaculates onto the girl's leg and genital area.
(%252540kp hardcore [0 48_close-up anal]_(pthc)(hussyf an).avi	This video is approximately 48 seconds in length and depicts an adult male engaged in anal intercourse with a prepubescent female. The video is focused on the female's genital area.

### **Media Seized During Search of the Residence**

9. On or about December 12, 2014, law enforcement executed a search warrant at the Residence. Pursuant to the search warrant, law enforcement seized multiple computers and electronic storage media belonging to HARING (the "Media"). The Media contained approximately 4,691 still images and approximately 75 videos of child pornography, including images of prepubescent children and infants being sexually abused.

10. Two of the approximately 4,691 still images and 1 of the approximately 75 videos located on the Media belonging to HARING are described in detail below:



<b>File Name</b>	<b>Description</b>
!!as_250.jpg	This black and white image depicts a prepubescent female engaged in sexual intercourse with an adult male. The female is lying on her back and visible from her head to her legs. She is naked except for white sock on her right leg. Her legs are spread exposing her genital area. The adult male is also naked and visible from his chest to his knees. His right hand is squeezing the right breast of the female and his left hand is pressing his erect penis against the female's vagina.
!!dcp00619.jpg	This image depicts a prepubescent female engaged in sexual intercourse with an adult male. The female is naked and visible from her chest to her feet and lying on her back. The adult male's chest and thighs are visible. He is wearing a dark colored patterned shirt and is naked below the waist. The male is in a kneeling position and holding the legs of the prepubescent female over his thighs. His penis is lying on top of the female's vagina and a white liquid is visible on the female's stomach.
!OAMY-{\1}.87MB-JoyfullySucksCOC K-Yummy.wmv	This video is approximately 22 seconds in length and depicts a clothed prepubescent female performing oral sex on an adult male. The female is wearing dark colored clothing with white stripes on her sleeves and the down the sides of her pants. Only the stomach and erect penis of the adult male are visible. The prepubescent female performs oral sex on the adult male for the first seven seconds on the video. The male then proceeds to masturbate for the next ten seconds. At approximately the 17 second mark, the female resumes oral sex on the male and this continues for the remainder of the video.

### **Interstate Commerce**

11. Based upon my education, training and experience, and my discussions with other law enforcement officers, the images described in paragraphs 5, 7, and 9 above traveled in interstate commerce and were produced using materials that were mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the images were downloaded from the Internet, based upon, among other things, their presence on HARING's Media and law enforcement's knowledge that HARING had uploaded these images to a website and shared these images on an internet-based P2P network.